

United States District Court  
for the Middle District of Alabama

RECEIVED

2006 JUL 18 A 9:40

U.S. DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA

Debra Joyce Clackler 159516

Full name + prison number of plaintiff

v.

Civil Action Number: 2:06-cv-00172-WHA

Gladys Deese et al.,

Defendants

Plaintiff's Request for Production of Documents

Pursuant to Rule 26 and Rule 34 of the Federal Rules of Civil Procedure, plaintiff requests that the defendants produce the following documents:

1. All documents that evidence, mention, or refer to plaintiff's low heart rate on June 24, 2005, prior to her lipoma surgery at Montgomery Surgical Center, including but not limited to medical records, EKG, incident reports, statements and documents.
2. The complete contents of plaintiff's prison file, including but not limited to incident reports, evaluations, and medical and mental health records.
3. All documents written or created that contain, mention, construe, refer to an inquiry or complaint about medical conditions at

Julia Tutwiler Prison for Women, whether formal or informal, official or unofficial, including inmate and staff complaints and appeals, and including responses to such documents prepared by prison staff or their agents.

4. Copies of any other material that the defendants intend to use at trial.

5. Copies of all complete medical records.

6. All other documents, items of evidence, or sworn or unsworn statements or affidavits that relate to the allegations made in plaintiff's inadequate medical care complaint.

Plaintiff requests that the defendants send copies to her at Julia Tutwiler Prison for Women, 8966 US Highway 231, Wetumpka, Alabama 36092.

Done this 16th day of July, 2006.

Debra Joyce Clackler  
Signature of Plaintiff

## Certificate of Service

This is to certify that I have this day served counsel for the opposing parties a copy of the foregoing document by first-class United States mail in a properly addressed envelope with adequate postage thereon. The individuals served are:

Office of the Clerk  
United States District Court  
P.O. Box 711  
Montgomery, AL 36101-0711

Baleh + Bingham LLP  
P.O. Box 18668  
Huntsville, AL 35804-8668

Attorney General Troy King  
11 South Union Street, Suite 310  
Montgomery, AL 36130

This 16th day of July, 2006.

Debra Jayce Clackler  
Petitioner